

REMARKS

This Amendment is being filed in response to the Final Office Action mailed January 3, 2007, which has been reviewed and carefully considered. Entry of the present amendment and allowance of the present application in view of the amendments made above and the remarks to follow are respectfully requested.

By means of the present amendment, the current Abstract has been deleted and substituted with the enclosed New Abstract which better conforms to U.S. practice. Further, the specification has been amended to correct certain informalities and to better conform to U.S. practice.

By means of the present amendment, claims 1-20 have been amended to place them in better form for appeal and for better conformance to U.S. practice, such as beginning the dependent claims with 'The' instead of 'A', and changing "characterized in that" to --wherein--. Claims 1-20 were not amended in order to address issues of patentability and Applicant respectfully reserves all rights under the Doctrine of Equivalents. Accordingly, no new issues requiring a new search have been introduced and thus entry

of the present amendment is respectfully submitted.

In the Final Office Action, claims 1-20 are rejected under 35 U.S.C. §103(a) as allegedly unpatentable over U.S. Patent No. 6,393,574 (Kashiwagi) in view of U.S. Patent No. 5,784,528 (Yamane). It is respectfully submitted that claims 1-20 are patentable over Kashiwagi and Yamane for at least the following reasons.

At the outset, it is respectfully pointed out that Kashiwagi has 74 figures and 76 columns, while Yamane has 80 figures and 88 columns. Thus, both Kashiwagi and Yamane are qualified as "complex" patents. Therefore pursuant to 37 CFR 1.104, the Examiner must indicate how the references are being applied.

In rejecting independent claim 1, 6 and 17, on page 4, first full paragraph of the Final Office Action, the Examiner alleges that column 20, lines 31-39 of Kashiwagi teaches the following feature recited in independent claim 1, and similarly recited in independent claims 6 and 17:

defining a playable title as a playback sequence
of all complete cells or a subset of complete
cells of a recording in the order of allocation
within the video object storage area on the disc.

It is respectfully submitted that column 20, lines 31-39 of

Kashiwagi merely teaches the internal structure (FIG 16) of each video title set (VTS) stored on a disk (FIG 22).

As shown in FIG 16, and specifically recited on column 20, lines 31-39, each VTS has an information table VTS_PGCIT that:

records i (where i is a natural number) program chain (PGC) data blocks VTS_PGCI #1-VTS_PGCI #i for controlling the playback sequence. Each of the table entries VTS_PGCI #i is a data entry expressing the program chain, and comprises j (where j is a natural number) cell playback information blocks C_PBI #1-C_PBI #j. Each cell playback information block C_PBI #j contains the playback sequence of the cell and playback control information. (Emphasis added)

It is respectfully submitted that the above-noted section of Kashiwagi is concerned with cell playback sequence and playback control information, and is completely silent about any grouping the cell playback sequence. There is simply no teaching or suggestion in this section of Kashiwagi "defining a playable title as a playback sequence of all complete cells," as recited in independent claim 1, and similarly recited in independent claims 6 and 17. Having a playback sequence of the cell in no way teaches or suggests defining a playable title as a playback sequence. The playback sequence of the cell in above-noted section of Kashiwagi is not defined as a playable title.

Assuming, arguendo, that the above-noted section of Kashiwagi does teach defining a playback title as the cell playback sequence nevertheless, as correctly noted by the Examiner, Kashiwagi fails to teach:

generating a title list of titles sorted in the order of arrangement within the video object storage area on the disc,

as recited in independent claim 1, and similarly recited in independent claims 6 and 17. Column 9, "lines 35+" of Yamane is cited on page 4 of the Final Office Action in an attempt to remedy this deficiency in Kashiwagi.

It is respectfully submitted that Column 9, lines 35-55 of Yamane specifically recite:

The encoding system controller 200 also generates the reproduction time information IT defining the reproduction time of the title editing unit (video object, VOB), and the stream encoding data St33 defining the system encode parameters for multiplexing the encoded multimedia stream containing video, audio, and sub-picture data. Note that the reproduction time information IT and stream encoding data St33 are generated for the video object VOB of each title in one video zone VZ.

The encoding system controller 200 also generates the title sequence control signal St39, which declares the formatting parameters for formatting the title editing units VOB of each of the streams in a particular time-base

relationship as a multimedia bitstream. More specifically, the title sequence control signal St39 is used to control the connections between the title editing units (VOB) of each title in the multimedia bitstream MBS, or to control the sequence of the interleaved title editing unit (VOBs) interleaving the title editing units VOB of plural reproduction paths. (Emphasis added)

It is respectfully submitted that the above-noted section of Yamane merely teaches an encoding system controller 200, shown in FIG 2, that outputs two signals, namely:

- (1) a stream encoding data St33 defining the system encode parameters; and
- (2) a title sequence control signal St39, which declares the formatting parameters for formatting the title editing units.

The above-noted section of Yamane simply does not teach or suggest generating a title list of titles, as recited in independent claims 1, 6 and 17. Rather, Yamane merely teaches a title sequence control signal.

In view of both Kashiwagi and Yamane being "complex" patents, and if the Examiner persists with any of the above rejections, then it is respectfully requested that the exact location in the references be specified using closed ended column and line numbers, as well as specifying which words, phrases and/or sentences in the

references allegedly teach or suggest the present invention as recited in the claims.

Accordingly, it is respectfully submitted that independent claims 1, 6 and 17 is allowable, and allowance thereof is respectfully requested. In addition, it is respectfully submitted that claims 2-5, 7-16 and 18-20 should also be allowed based at least on their dependence from independent claims 1, 6 and 17.

Claim 2-4, 7-9 and 18-20 also include patentable subject matter. In particular, on page 4 of the Final Office Action, in rejecting claims 2, 7 and 18, column 19, lines 5-25 of Kashiwagi is cited to allegedly show "free space title."

It is respectfully submitted that column 19, lines 5-25 of Kashiwagi specifically recites:

More particularly, it is virtually impossible to record discrete titles satisfying every possible request even using the massive capacity of the digital video disk medium. While it may be concluded that this problem can be easily solved by increasing the capacity of the recording medium, this is an obviously undesirable solution when the effective use of available system resources is considered.

Using multi-scene control, the concept of which is described in another section below, in a DVD system, it is possible to dynamically construct titles for numerous variations of the same basic content using the smallest possible

amount of data, and thereby effectively utilize the available system resources (recording medium). More specifically, titles that can be played back with numerous variations are constructed from basic (common) scene periods containing data common to each title, and multi-scene periods comprising groups of different scenes corresponding to the various requests. During reproduction, the user is able to freely and at any time select particular scenes from the multi-scene periods to dynamically construct a title conforming to the desired content, e.g., a title omitting certain scenes using the parental lock control function. (Emphasis added)

Assuming, arguendo, that "omitting certain scenes using the parental lock control function," as recited on column 19, lines 24-26 of Kashiwagi is analogous to "defining a free space title," as recited in claim 2, and similarly recited in claims 7 and 18, it is respectfully submitted that "including the free space title in the title list" (as recited in claim 2, and similarly recited in claims 7 and 18) is nowhere taught or suggested in the above-noted section of Kashiwagi.

The same above-noted section, namely, column 19, lines 5-25 of Kashiwagi is also cited in rejection claims 3, 8 and 19, on page 4 of the Final Office Action. It is respectfully submitted that this section of Kashiwagi merely teaches "omitting certain scenes using the parental lock control function," and is completely silent

and does not teach or suggest "blocking free space titles for playback," as recited in claim 3, and similarly recited in claims 8 and 19.

On page 5 of the Final Office Action Column 19, "lines 5+" of Kashiwagi is cited in rejection claims 4, 9 and 20. It is respectfully submitted that nowhere in column 19 is there a teaching or suggestion of "converting a deleted title to a free space title," as recited in claim 4, and similarly recited in claims 9 and 20.

If the Examiner maintains this rejection of claims 4, 9 and 20, then it is respectfully requested that the exact location in Kashiwagi be specified using closed ended column and line numbers, as well as specifying which words, phrases and/or sentences in the references allegedly teach or suggest converting a deleted title to a free space title, as recited claims 4, 9 and 20.

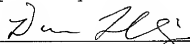
Converting a deleted title to a free space title, as recited in claims 4, 9 and 20; where the deleted title is blocked from playback, as recited in claims 3, 8 and 19; where the deleted title is included in the title list, as recited in claims 2, 7 and 18; are nowhere taught or suggested in Kashiwagi, Yamane and

combination thereof.

In addition, Applicant denies any statement, position or averment of the Examiner that is not specifically addressed by the foregoing argument and response. Any rejections and/or points of argument not addressed would appear to be moot in view of the presented remarks. However, the Applicant reserves the right to submit further arguments in support of the above stated position, should that become necessary. No arguments are waived and none of the Examiner's statements are conceded.

In view of the above, it is respectfully submitted that the present application is in condition for allowance, and a Notice of Allowance is earnestly solicited.

Respectfully submitted,

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Enclosure: New Abstract

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